

Sean Quigley

From: Daniel Reinganum <danielr@mcdowelllegal.com>
Sent: Friday, December 23, 2022 11:50 AM
To: jeffrey.m.sponder_usdoj.gov; Chambers_of ABA
Cc: doug.stanger_flastergreenberg.com; Jacci Vigilante; William Katz
Subject: RE: Choates G. Contracting, LLC; Request to Amend Court's Prior Order Authorizing Sale; 21-13085-ABA by Consent

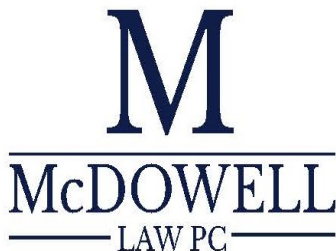
CAUTION - EXTERNAL:

Good morning Judge Altenburg,

As a follow up to Mr. Sponder's e-mail (wherein he indicated the USTO takes no position other than seeking to ensure that all affected parties received notice of this application), I can represent to the Court and parties that all affected parties have received notice of this application.

Thank you again for your courtesies,

Daniel L. Reinganum, Esq. | *Associate Attorney*



46 West Main Street
Maple Shade, NJ 08052
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From: Sponder, Jeffrey M. (USTP) <Jeffrey.M.Sponder@usdoj.gov>
Sent: Friday, December 23, 2022 11:41 AM
To: Chambers_of ABA <Chambers_of_ABA@njb.uscourts.gov>

Cc: Stanger, Doug <Doug.Stanger@flastergreenberg.com>; Jacci Vigilante <jacci@thevigilantelawfirm.com>; William Katz <WKatz@sanddlawyers.com>; Daniel Reinganum <danielr@mcdowelllegal.com>

Subject: RE: Choates G. Contracting, LLC; Request to Amend Court's Prior Order Authorizing Sale; 21-13085-ABA by Consent

Dear Judge Altenburg:

Good morning again. Kindly ignore my prior email as it was incorrect. The United States Trustee does **not** have a position concerning this motion. However, the United States Trustee wants to make sure that all necessary parties received notice.

Respectfully submitted,

Jeffrey M. Sponder



From: Sponder, Jeffrey M. (USTP) <Jeffrey.M.Sponder@usdoj.gov>

Sent: Friday, December 23, 2022 11:37 AM

To: Chambers_of ABA <Chambers_of_ABA@njb.uscourts.gov>

Cc: Stanger, Doug <Doug.Stanger@flastergreenberg.com>; Jacci Vigilante <jacci@thevigilantelawfirm.com>; William Katz <WKatz@sanddlawyers.com>; Daniel Reinganum <danielr@mcdowelllegal.com>

Subject: RE: Choates G. Contracting, LLC; Request to Amend Court's Prior Order Authorizing Sale; 21-13085-ABA by Consent

Good morning Your Honor.

The United States Trustee does have a position concerning this motion. However, the United States Trustee wants to make sure that all necessary parties received notice.

Respectfully submitted,

Jeffrey M. Sponder



From: Daniel Reinganum <danielr@mcdowelllegal.com>

Sent: Friday, December 23, 2022 11:21 AM

To: Chambers_of ABA <Chambers_of_ABA@njb.uscourts.gov>

Cc: Stanger, Doug <Doug.Stanger@flastergreenberg.com>; Jacci Vigilante <jacci@thevigilantelawfirm.com>; William Katz <WKatz@sanddlawyers.com>; Sponder, Jeffrey M. (USTP) <Jeffrey.M.Sponder@usdoj.gov>

Subject: [EXTERNAL] RE: Choates G. Contracting, LLC; Request to Amend Court's Prior Order Authorizing Sale; 21-13085-ABA by Consent

Good morning Judge Altenburg,

Doug Stanger, Sub-V Trustee, Jacci Vigilante (on behalf of Scott Braidwood), and William Katz (on behalf of Philly Properties and Drexel Properties) have advised me that they have no objection to the entry of the Proposed Amended Order. Mr. Sponder has not answered, nor have I been able to reach him by telephone. However, I note that the USTO did not file any objection to the sale at the time it was proposed.

In light of the above, I respectfully submit that the necessary parties have consented and request that the attached Amended Court Order be entered as soon as possible.

Again, I thank the Court for its courtesies in this matter. A motion with regard to this was filed at Docket No. 225, and an application to shorten time was filed at Doc 226. In support I have also filed copies of the written consent of these parties on the docket at 227.

A copy of the proposed order for entry is attached hereto.

Very truly yours,

Daniel L. Reinganum, Esq. | *Associate Attorney*



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From: Daniel Reinganum

Sent: Friday, December 23, 2022 12:43 AM

To: Chambers_of ABA <Chambers_of_ABA@njb.uscourts.gov>

Cc: Stanger, Doug <Doug.Stanger@flastergreenberg.com>; Jaci Vigilante <jacci@thevigilantelawfirm.com>; William Katz <WKatz@sanddlawyers.com>; jeffrey.m.sponder_usdoj.gov <jeffrey.m.sponder@usdoj.gov>

Subject: Choates G. Contracting, LLC; Application to Shorten Time & Motion to Amend Court's Prior Order Authorizing Sale; 21-13085-ABA

Dear Judge Altenburg,

Attached kindly find a motion to Amend the Court's prior Order approving the sale of 122 Danton Lane as well as an Application to Shorten Time. The court previously approved the sale of this real estate to Zerrick Balckom. For financing purposes, it appears necessary for Mr. Balckom to take title in the name of an LLC. The title company is requiring an amended order approving the sale which permits the sale to an LLC. The date/time requested is December 23, 2022 as soon as possible (I am aware that the request is for a same day hearing and that it is now shortly after 12:30 am on the 23rd). I apologize for the urgency of the request. The basis for the urgency is that the Debtor's major creditors have threatened (not unjustifiably) to seek conversion of this case to Chapter 7 if the sale is not completed by 4:00 pm on December 23, 2022. The parties to this transaction were only made aware of this financing related issue when all parties appeared in my office on December 22 at 3:00 pm with the intention of closing on this sale.

Thank you in advance for any courtesies which the Court can extend to the Debtor and Purchaser in this matter. Copied on this e-mail, are Doug Stanger (Sub-V Trustee), Steven P. Kelly (attorney for 1st mortgage holder, Nationstar/Velocity Capital), Jaci Vigilante (attorney for Scott Braidwood, 2nd mortgage holder), William Katz, Esq. (attorney for Philly Properties GP, LLC and Drexel Properties GP, LLC) and Jeffrey Sponder, Esq. – attorney for the United States Trustee's Office.

Respectfully submitted,

Daniel L. Reinganum, Esq. | *Associate Attorney*



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